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**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
National Ocean Service  
Office of Ocean Resources Conservation and Assessment  
Hazardous Materials Response and Assessment Division  
Coastal Resources Coordination Branch

NOAA - Haz Mat  
c/o USEPA Waste Division  
345 Courtland Street  
Atlanta, Georgia 30308  
404-347-5231

**MEMORANDUM**

**Date:** 18 August 1992

**To:** Cheryl W. Smith, Remedial Project Manager, South Superfund Remedial Branch, USEPA, Region IV

**From:** Waynon Johnson   
Coastal Resource Coordinator, NOAA, Region IV

**Subject:** Olin Corporation Site, McIntosh, Washington County, Alabama

Review of the subject document for the Olin Corporation McIntosh Plant Site, McIntosh, Washington County, Alabama was conducted by technical representatives of the Natural Resource Trustee for the National Oceanic and Atmospheric Administration (NOAA), U. S. Department Of Commerce. The following comments are offered for your consideration.

**Documents Reviewed:**

1. *Environmental Evaluation Technical Memorandum: Remedial Investigation (RI)/Feasibility Study (FS), McIntosh Plant Site, Olin Corporation, McIntosh, Alabama. July 1992*

**Background:**

The ecological assessment (EA) for the Olin Corporation Site is being conducted in two phases. The Environmental Evaluation Technical Memorandum (EETM) represents the first phase and includes characterization of the biota, identification of the chemicals of concern and an evaluation of potential ecological impacts. The EETM also identifies data requirements needed to complete the ecological assessment. Potential toxicological impacts to biota will be further characterized in the second phase.

The ecological assessment focuses only on Operable Unit (OU) 2. This is the Olin basin area, including the wetlands within the Olin property line and the wastewater ditch leading to the basin. The EA utilized chemical data (surface water, sediment, and tissue) from Phase I (August 1991) and Phase II (November 1991) sampling activities. No additional data were collected as part of the ecological assessment.

**Comments:**

As presented in the EETM, the EA will be confined to OU-2 and will not include the adjacent Tombigbee River. Because the Tombigbee River regularly floods the basin and may be contiguous with it for up to six months of the year, it is likely that site-related contaminants have been and are continuing to be carried into the river. This position is indirectly supported in the discussion of the



macrobenthic community results; it is stated that the absence of allochthonous coarse particulate organic matter in the basin may be due to annual flooding and flushing of the basin. If such is the case, then it seems reasonable that contaminated sediments as well would be flushed from the basin into the river. As recommended by NOAA in previous comments, the EA should be expanded to include the river. If off-site contaminant transport from the basin is found to occur, the EA for the Olin site should address fully the threat to NOAA trust resources.

The approach presented by Woodward-Clyde for conducting the EA should be effective in assessing the potential risk to the environment posed by site-related contamination. Although not specifically stated in the EETM, it is important that the risk assessment consider transfer of contaminants through the food chain as well as the risk to all organisms, including non-trustee species, that may utilize areas contaminated by site-related contaminants.

Thank you for providing NOAA the opportunity to comment on this site and for keeping me apprised of ongoing activities. I will be happy to discuss any questions or comments pertaining to this review that you may have. My telephone number is (404) 347-5231.